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July 2, 2018

Andrew G. Woodson
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Mr. Jeff S. Jordan
Attn: Kathryn Ross, Paralegal
Office of Complaints Examination and Administration
Federal Election Commission
105 First Street, NE
Washington, D.C. 20463

Re: Matter Under Review 7407 (Donald J. Trump for President, Inc. *et al.*)

Dear Mr. Jordan:

On June 5, 2018, Free Speech for People filed a complaint with the Federal Election Commission ("Commission"), alleging that several respondents violated the Federal Election Campaign Act of 1971, as amended ("FECA").

Consistent with 11 C.F.R. § 111.4(d)(1), the complaint identified the following individuals and entities as respondents: Donald J. Trump for President, Inc., Elliott Broidy, Michael Cohen, Real Estate Attorneys Group, and Essential Consultants, LLC. The complaint did not identify our client, American Media, Inc. ("AMI"), as a respondent and there is no assertion in the complaint that AMI violated the FECA.

Pursuant to 52 U.S.C. § 30109(a)(1), a complainant must file a complaint setting forth a violation of the FECA and "the Commission shall notify, in writing, any person alleged in the complaint to have committed such a violation." (Emphasis added.) Commission regulations further provide that, following an initial review, "the General Counsel [shall] notify each respondent that the complaint has been filed," that the General Counsel may recommend to the Commission whether "a respondent has committed or is about to commit a violation of the [FECA]," and that the Commission will not share a complaint with anyone "without the written consent of the respondent with respect to whom the complaint was filed." See 11 C.F.R. §§ 111.5, 111.7, 111.21 (emphasis added).

Despite these clear and unambiguous limits on its authority, the General Counsel's Office nevertheless notified AMI of the complaint and *sua sponte* alleged that AMI "may have violated the [FECA]." Because these allegations are not made



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in the complaint, AMI has no obligation to respond to a complaint that fails to meet statutory standards and Commission rules.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Woodson".

Andrew G. Woodson

Enclosure



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7407

Name of Counsel: Andrew Woodson

Firm: Wiley Rein LLP

Address: 1776 K Street NW

Washington, D.C. 20006

Office#: (202) 719-7000

Fax#: (202) 719-7049

Mobile#: _____

E-mail: awoodson@wileyrein.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6/29/18
Date

[Signature]
(Signature - Respondent/Agent/Treasurer)

Gen. Counsel - Media
Title

RESPONDENT: American Media, Inc.

(Committee Name/ Company Name/Individual Named in Notification Letter)

(Print Treasurer Name if Applicable)

Mailing Address: 4 New York Plaza
(Please Print)

New York, NY 10004

Home#: _____

Mobile#: _____

Office#: 212 743 6513

Fax#: _____

E-mail: cstracher@amlink.com

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.